

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KELLY BOLDING, and MICHAEL  
MANFREDI, individually and on behalf of  
a class of all others similarly situated,

Plaintiffs,

v.

BANNER BANK, a Washington Corporation,

Defendant.

No. C17- 0601RSL

DECLARATION OF KRISTINA  
BOETTCHER-MILLEVILLE IN  
OPPOSITION TO PLAINTIFFS'  
PRE-DISCOVERY MOTION FOR  
COLLECTIVE ACTION  
CERTIFICATION UNDER 29  
U.S.C § 216(b) AND TO SEND  
NOTICE TO THE CLASS

*Note on Motion Calendar:*  
September 1, 2017

1                                    **DECLARATION OF KRISTINA BOETTCHER-MILLEVILLE**

2            I, Kristina Boettcher-Milleville, declare as follows:

3            1.        ***Identity of Declarant.*** I am employed by Banner Bank in Spokane, Washington.  
4 I have been employed by Banner Bank since March 13, 2017. My current position at Banner  
5 Bank is Senior Human Resources Information Systems Analyst. I have held this position since  
6 March 13, 2017. I am over the age of 18 years and have personal knowledge of the matters  
7 stated in this Declaration. If called and sworn as a witness, I would testify competently to them.

8            2.        ***Declarant's Responsibilities.*** In my position as an Information Systems Analyst,  
9 I have responsibility for overall data integrity, user provisioning, process enhancement and  
10 implementation of current-state Human Resources systems.

11           3.        ***Familiarity with Business Records.*** In my capacity as an Information Systems  
12 Analyst at Banner Bank, I am familiar with Banner Bank's and AmericanWest Bank's ("AWB")  
13 business records regarding employee information. Based on my regular activities in support of  
14 Banner Bank's business, I am familiar with how Banner Bank stores, manages access to, and  
15 retrieves these records. I have reviewed AWB's and Banner Bank's business records regarding  
16 employees.

17                                    **AmericanWest Bank**

18           4.        AWB's employee records were maintained by a timekeeping system called  
19 Ceridian during all times relevant to this matter.

20           5.        Between August 2014 and October 2015 when its operations ceased, AWB  
21 employed approximately 31 different loan officers in approximately 29 different branches across  
22 4 states.

23           6.        At the time it was acquired by Banner Bank in October 2015, AWB had  
24 operations in 5 states.

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**Banner Bank**

7. Banner Bank's employee records were maintained by a human resources system called Sage Abra, until approximately June 2015 when Banner Bank switched over to a system called UltiPro. Banner Bank still uses UltiPro.

8. Since August 2014, Banner Bank employed approximately 139 different loan officers in approximately 52 different branches across five states.

9. Combined, AWB and Banner Bank employed approximately 148 different loan officers since August 2014 across five states.

**AWB & Banner Bank Employee Information**

10. Kelly Bolding worked as an MLO at AWB from June 2011 until October 2015, when she became a Banner Bank MLO as a result of Banner Bank's acquisition of AWB. She left Banner Bank in February 2016. During her entire employment, Ms. Bolding worked at the Home Loan Center in Spokane, Washington.

11. Michael Manfredi worked for AWB from June 2014 to January 2015. During his entire employment, Mr. Manfredi worked at the Carmel Valley Branch in California. Mr. Manfredi resigned prior to Banner Bank's acquisition of AWB in October 2015, which means he never worked for Banner Bank.

12. Miranda Taylor (formerly Moen) worked for AWB as a Loan Officer Assistant beginning in September 2013, and in October 2015, she joined Banner Bank as a Loan Officer Assistant as part of the acquisition. In March 2016, Banner Bank promoted her to MLO, but she left Banner Bank nine months later in December 2016. During her entire employment, Ms. Taylor worked at the Downtown Spokane branch in Spokane, Washington.

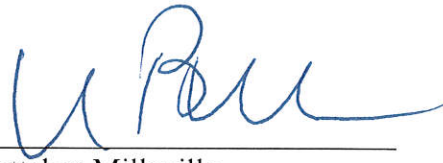
13. Lisa Knight worked for AWB from December 2013 until October 2015, when she became a Banner Bank MLO as a result of Banner Bank's acquisition of AWB. Ms. Knight is a current Banner Bank loan officer. During her entire employment, Ms. Knight has worked out of the Spokane Downtown branch.

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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed at Spokane, Washington, August 21, 2017.

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4 By



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Dated this 21st day of August, 2017.

**CERTIFICATE OF SERVICE - 1**  
**(C17-0601RSL)**

**Davis Wright Tremaine LLP**  
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